



CODE OF ETHICS

Our patterns of professional conduct and relationship
with the professional and social environment

Table of contents

1. Message from the General Manager

2. Introduction

3. Values that inspire us

- Personal and professional ethics
- Excellence
- Service vocation
- Commitment
- Dedication

4. Standards of behaviour

- Compliance with corporate laws and regulations
- Respect and non-discrimination policies
- Conflict of interests
- Use of insider information
- Relationship with the professional environment
- Protection of information and confidentiality
- Protection and correct use of assets
- Treatment of financial information
- Responsibility towards the environment

5. Application of the Code of Ethics

6. How to act?



Message from the general manager

Dear associates:

You have repeatedly heard me say that corporate success and corporate responsibility are inextricably linked. You also know about the importance I give to having solid values that inspire and guide us in our business project. These are statements which I am fully convinced of and which refer to our conduct, both as an organisation and as people.

The Ethical Code that today I have the honour to present to you reflects this belief. It is a document which, based on what we are and what we already do well, brings together all those principles and guidelines of good governance that are essential in the performance of our business.

In carrying out our activity in the healthcare field, it is even more important to maintain an exemplary attitude in any of the issues we address, since what we do directly affects people and society.

The Eugin Group's Code of Ethics belongs to all the members of the Group, and requires the commitment of each and everyone of us. It is important that we make its content ours, in the firm conviction that our individual and collective performance must be exemplary.

When we speak of guidelines, we do not just refer to obligations but also to rights. Promoting an ethical and legal business practice, creating the rules and mechanisms that sustain it, fostering a working environment in which all problems can be approached openly, and ensuring a fair and equitable treatment for all people, is the only way to build a strong and stable project that we all feel proud of.

Finally, I would like to take this opportunity to thank all Eugin Group's employees for the effort and contribution to the company's business success, and for the commitment to respect our responsibilities to society.

With kind regards,

Eduardo González, CEO Eugin Group.

Introduction

This Code...

originated with the intention of being a guide and a reference manual that should help us in our daily activities and decisions. It addresses, among other subjects, important issues regarding integrity in the business activity and the treatment of our employees, customers, suppliers and associates.

Eugin's Code of Ethics is shared and promoted by the management bodies of all the companies that make up the Eugin Group. It also belongs to all the members taking part in the Eugin Group, and requires the commitment of each of us regardless of the position and role they play. In this regard, it is applicable to all the companies and subsidiaries making up the Eugin Group.

All of us who make up Eugin comply with the law responsibly and remain committed to respecting the ethical principles and values set out in this document.

The principles contained in this Code of Ethics are the same for all the countries in which Eugin operates, regardless of local laws, customs and practices, unless the latter are more stringent.

Values that inspire us

Our values

Values are the pillars that govern our way of acting. They shape Eugin's culture, a culture of continuous improvement based on research and the scientific advancement of assisted reproduction in the service of society.

Personal and professional ethics

At Eugin we stand out by exercising our profession based on honesty and consistency in the way we act, as well as transparency in the way we communicate.



Personal and professional ethics are based on concepts applicable to our way of being and working:

- For us, **honesty** comes first in the exercise of our profession.
- We are **consistent** in our behaviour, knowing that by showing the way, we are setting a precedent in the way we act.
- We are committed to communication that gives priority to **transparency**.

Excellence



At Eugin we act with total professionalism and maximum rigour, characteristics that define our processes and procedures. In this regard, the efficiency and effectiveness of our work and the desire for continuous improvement allows us to evolve in pursuit of the best results.

Values that inspire us

Service vocation



Eugin's staff stand out by attending our patients in an excellent way, caring for their needs, empathizing and listening to their requests. In addition, we try to anticipate their needs, focusing on the solution.

All our efforts are focused on offering our help and understanding. Empathy and active listening are defining features of the personal profile of our people, both in relation to the patient, and among the people of Eugin itself, all of which contributes to a pleasant working environment.

Commitment



Our commitment is total, both with patients and with our partners. At Eugin we take responsibility for everything that we do and what the patient expects of us, involving ourselves to the fullest as a team so that we can offer the best solution.

The involvement in the performance of our responsibilities, and team spirit are the defining qualities of the commitment acquired and practised by the people who make up Eugin.

Dedication



The dedication of our people is exemplified through the maximum interest and willingness to perform the tasks and functions entrusted, and to devote the time required to solve them. This willingness is felt by patient and colleague alike.

The willingness and flexibility to adapt to any situation for the benefit of both patients and colleagues is reflected in a patient-oriented day-to-day approach, thereby facilitating the development of one's own work and that of others by investing in the time needed to meet the needs of our patients.

Standards of behaviour

1. Compliance with national laws and corporate regulations

It is the responsibility of Eugin members to know the laws and regulations applicable to their area of activity.

Eugin is responsible for informing and training its employees about the corporate policies and ethical and health standards that apply to each activity.

2. Respect and non-discrimination policy

At Eugin we maintain a climate of respect, dignity and equality of opportunities for both personal and professional development, this being a commitment in which we all take responsibility.

Therefore, no Eugin employee will be discriminated against on the basis of age, disability, sex, origin, including racial or ethnic origin, marital status, social status, religion or belief, political views, sexual orientation or status, or membership or non-membership of a trade union.

At Eugin we do not tolerate conduct considered to be harassing or intimidating, be it sexual or of any other nature. Eugin encourages respectful and dignified treatment towards any person with whom an employee interacts in the context of his / her work activity.

With regard to equal opportunities, professional careers at Eugin are based on facts and data, such as the quality of the work performed, the level of performance, current skills and the ability to take on new responsibilities.

Furthermore, our purpose is to contribute towards generating a working environment where confidence, friendliness, teamwork and respect for the dignity of people prevails. With our attitude, each and every one of us contributes towards creating such a working environment and to preserving it.

3. Conflict of interests

Our performance is comprehensive and responds solely to Eugin's business interests, avoiding any situation in which a decision can be influenced by personal interest.

Eugin workers promote Eugin's good reputation. It is an intangible asset and difficult to achieve, which must be preserved by everyone because it is a result of both the corporate behaviour of the organisation and the people who are part of it.

4. Use of insider information

Eugin workers who have insider information should not disseminate or gain any advantage from it. Such conduct may be subject to investigation and prosecution by the official authorities, and will not be accepted by Eugin.

Standards of behaviour

5. Relationship with the professional environment

Eugin is committed to maintaining high standards of quality in its products and treatments, as well as to competing fairly in the market. To this end, Eugin takes great care of its relationship with its key partners:

- **Clients and suppliers:** we actively seek to work with companies that are serious and respectful of legality, who share the behavioural standards detailed in this Code of Ethics.
- **Competitors:** We comply with and respect the applicable competition laws. Our employees act in a loyal way and do not exchange information that could harm Eugin's interests and/or free competition in the market.

6. Protection of information and confidentiality

At Eugin we have established policies for the protection of confidential information with the aim of guaranteeing the integrity of our workers and patients, as well as the Company's assets.

Eugin employees defend the interests of the Company and we undertake to keep in the strictest confidence any information in the presence of third parties regarding the confidential information that we have access to at work or on account of it.

Eugin employees maintain the strictest confidentiality regarding any sensitive information that we may have regarding the companies or entities in which we have carried out our work prior to joining Eugin.

The responsibility for protection and confidentiality also extends to the information and personal data of our colleagues, so we ensure that we comply with the provisions of the Organic Law on Data Protection.

7. Protection and correct use of assets

Eugin employees are aware of the importance of safeguarding, taking care of and properly using the company's assets that the company makes available for the performance of our professional activity.

Inappropriate use of assets may lead to financial loss, irreparable harm to our patients and/or the consequent reputational damage to the company.

8. Treatment of financial information

At Eugin, the information included in the management reports and annual accounts is formulated following the requirements and principles established in the conceptual framework of the General Accounting Plan in force at the time, generally accepted accounting standards, IFRS (International Financial Reporting Standard), as well as the Company's internal criteria (integrity, comparability,

Standards of behaviour

continuity, accrual, uniformity, prudence and non-compensation).

This commitment to rigorousness also applies to any financial information that Eugin issues publicly.

9. Responsibility towards the environment

Eugin is a company firmly committed to protecting and respecting the environment, constantly striving to minimize negative impacts while endeavouring to achieve maximum energy and natural resource efficiency.

A responsible relationship with the environment is something that has come into being from the Company but which is transferred to the daily life of each and every one of the gestures that we carry out. By turning off the light when leaving a room, by reducing to the utmost the number of times we print a document or by depositing the waste in the appropriate container, every single Eugin employee is also contributing to a more sustainable world.

Application of the Code of Ethics

Who guarantees a correct application of the Code of Ethics?

The Code of Ethics is binding on all Eugin workers, directors and/or advisers, and the collaboration of all is absolutely essential to guarantee its application in each and every one of our activities.

Failure to comply with the Code of Ethics may entail disciplinary sanctions in accordance with the regime of offenses and penalties provided for in the Workers' Statute, in the applicable Collective Agreements as well as in current legislation. In addition, such breaches may give rise to the initiation of the pertinent legal actions.

Furthermore, Eugin has set up a "Compliance Committee" which ensures the correct application of the Code of Ethics by acting as an advisory body when it is necessary to interpret or implement policies and procedures to develop and ensure the effectiveness thereof.

There may be situations where the ethical or legal requirements are not obvious or are not specifically addressed in this Code of Ethics. In such cases, the situation may be presented to a superior, who will transfer the query to the "Compliance Committee" for resolution. The situation may also be reported directly to the "Compliance Committee" or to one of the members of the Committee so that he/she may relay the information to the Committee.

The "Compliance Committee" is currently composed of the Medical Management Department, the Human Resources Department, the Quality Assurance Division, as well as the Internal Audit Department and obtains external advice from a specialised law firm.

How to act?

How to act in the event of an unlawful practice

Eugin makes available to its employees, directors, advisors and group subsidiaries the following channels for communications related to the Code of Ethics

- **WHISTLEBLOWER CHANNEL:** The whistleblower channel is the preferred channel open to all stakeholders in the Eugin Group for making queries or sending in submissions regarding possible breaches of our Code of Ethics, as well as possible breaches of regulations applicable to our business.
[Access to the whistleblower channel](#)
- **ENQUIRIES CHANNEL:** the email address compliance@eugin.es is managed by the "Compliance Committee" and is the specific confidential means of communication for channelling the doubts and/or queries made by Eugin members regarding reasonable indications of the commission of acts contrary to the law or this Code.

The complaints must be identified and should relate the detail of the events that occurred. The identity of the complainant shall be regarded as confidential and the accused will not be informed. Complainants must guarantee the authenticity of the data provided. There shall be no reprisals of any kind against the complainants.

Notwithstanding the foregoing, the data of the persons making the communication may be supplied to the administrative or judicial authorities, inasmuch as they are required by such authorities as a consequence of any proceeding arising from the subject matter of the complaint, such as persons involved in any subsequent investigation or judicial proceedings instituted as a result of the investigation.

The data provided through both channels will be included in a personal file owned by Eugin for the management of the communication to the administrative or judicial authorities, where appropriate, and for the investigation proceedings.

Eugin undertakes to process this data in accordance with the legislation on the protection of personal data, and it will be cancelled as soon as the investigations have been completed, unless the measures adopted stem from administrative or judicial proceedings, or are during the period in which the complaints are made by Eugin employees or if the proceedings carried out thereof could generate liabilities.

